

DR. CARLOS BRINGUIER :
VS. :
GAMBI PUBLICATIONS, INC. : C.A. NO. 67-648
HAROLD WEISBERG :
AND :
DELL PUBLISHING CO., INC. : DIVISION "F"
:
: : : : : :

Defendant, HAROLD WEISBERG, appearing herein specially and reserving his right to file such Motion or Pleas as he deems necessary and proper, including but not limited to any Motion or Pleas to the lack of this Honorable Court's jurisdiction and venue over him, gives the following Answers and Objections to the Interrogatories propounded by Complainant in the above entitled and numbered Action:

OBJECTION TO INTERROGATORY NO. 1. Defendant, HAROLD WEISBERG, objects to the question for the reason that it is based on pre-supposition, has no relevancy to the proceeding before the Court and is calculated by inference to cause embarrassment to the said Defendant.

ANSWER TO INTERROGATORY NO. 2. Yes.

ANSWER TO INTERROGATORY NO. 3. The aforesaid article is a

reproduction of Chapter 11 of the book WHITEWASH of which I am the author.

INTERROGATORY NO. 4. Please state the name and address of your public liability insurer during the years commencing with 1965 until the present time?

ANSWER TO INTERROGATORY NO. 4. My public liability insurer commencing with 1965 until the present time is Aetna Casualty and Surety Company.

INTERROGATORY NO. 5. Did the underwriter referred to in Interrogatory 4 insure you against a suit for libel such as the instant suit? If not, please state the name and address of the underwriter who would cover you in such suits.

ANSWER TO INTERROGATORY NO. 5. To the best of my knowledge, the aforesaid public liability coverage does not cover a suit for alleged libel. To the best of my knowledge, I have no insurance with any company or underwriter insuring me against any alleged libel.

INTERROGATORY NO. 6. How many copies of the book "Whitewash" have you sold to date? If you cannot state exactly, please state approximately.

ANSWER TO INTERROGATORY NO. 6. I have sold approximately 20,000 copies of the book WHITEWASH as originally published by me. The book was subsequently published by DELL PUBLISHING CO., INC. I have no way of knowing the number of copies of WHITEWASH sold to date, as published by DELL PUBLISHING CO., INC., since the sale of said books was handled exclusively through DELL PUBLISHING CO., INC.

INTERROGATORY NO. 7. State in which states copies of your book "Whitewash" have been distributed or sold. Also, state which foreign countries same has been either distributed or sold.

ANSWER TO INTERROGATORY NO. 7. The book WHITEWASH; as originally published by me, was distributed and sold in all 50 States of the United States. It was also sold in certain Foreign Countries but

foreign sales were handled through a foreign distributor. As regards the subsequent publication of the book by DELL PUBLISHING CO., INC., I am unable to answer this Interrogatory for the reason that all sales of my book WHITEWASH were handled through DELL PUBLISHING CO., INC.

INTERROGATORY NO. 8. In your book "Whitewash" you make several references to Dr. Carlos Bringuier, plaintiff herein, and we ask that you please state the sources of your information for making said references.

OBJECTION TO INTERROGATORY NO. 8. I object to this Interrogatory and invoke the privilege of fair criticism and comment.

INTERROGATORY NO. 9. Please state the names and addresses of any and all persons or companies involved in the publishing or printing of your book "WHITEWASH".

ANSWER TO INTERROGATORY NO. 9. I, HAROLD WEISBERG, initially published the book WHITEWASH. My address is Hyattstown, Maryland; the book was subsequently published by DELL PUBLISHING CO., INC., 750 Third Avenue, New York, New York, 10017.

INTERROGATORY NO. 10. Please state the names and addresses of any and all public liability insurers of the persons or companies listed in your answer to Interrogatory number 10 (sic).

ANSWER TO INTERROGATORY NO. 10. I have no information as to the public liability insurers, if any, of DELL PUBLISHING CO., INC.

INTERROGATORY NO. 11. State whether or not you have ever testified before the Dies Committee (the predecessor to the House on Un-American Activities Committee). If your answer is in the affirmative, please state in detail the subject matter involved in your testimony.

OBJECTION TO INTERROGATORY NO. 11. I object to this Interrogatory on the ground that it is irrelevant to the proceeding before the Court and is posed for the purpose of, by inference, causing embarrassment.

INTERROGATORY NO. 12. Are you now, or have you ever been a member of the Communist Party or in any way affiliated or sympathetic toward same?

OBJECTION TO INTERROGATORY NO. 12. I object to this Interrogatory on the ground that it is irrelevant to the proceeding before the Court and is posed for the purpose of, by inference, causing embarrassment.

INTERROGATORY NO. 13. State in detail the exact manner in which you have been associated, affiliated or otherwise, if any, with the former organizations named the "Silver Shirts", "Christian Front", or the "Labor's Nonpartisan League".

OBJECTION TO INTERROGATORY NO. 13. I object to this Interrogatory on the ground that it is irrelevant to the proceeding before the Court and is posed for the purpose of, by inference, causing embarrassment.

HAROLD WEISBERG

STATE OF NEW YORK

BOROUGH OF MANHATTAN

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared:

HAROLD WEISBERG,

who, after being by me first duly sworn did depose and say:

That he is one of the Defendants in the above entitled proceeding; that he has read the foregoing Answers and Objections to Interrogatories and knows the contents thereof; that the same are true and correct except as to those made on information and belief and as to those matters, I believe then to be true and correct.

HAROLD WEISBERG

SWORN TO AND SUBSCRIBED

BEFORE ME THIS _____ DAY

OF JULY, 1967.

NOTARY PUBLIC

MY COMMISSION EXPIRES: